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March 11, 2022

**VIA ECF**

Honorable Sharon A. King, U.S.M.J.  
Mitchell H. Cohen Building & U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

**Re: Dunn, et al., v. PHH Mortgage Corporation  
Civil Action No.: 1:20-cv-05848-RBK-KMW**

Dear Judge King:

The parties respectfully write to request that the Court schedule a conference promptly to discuss mediation. To date, the parties have engaged in three meet-and-confer conferences to discuss the possibility of settlement.<sup>1</sup> Progress towards a settlement has been made but a number of outstanding issues remain. The parties believe that these issues might be resolved with assistance from the Court. Specifically, the parties seek to discuss a schedule for court-assisted mediation and the details of a mediation statement, if necessary. In light thereof, the parties propose extending the case calendar by 90 days to facilitate the parties' efforts.

Should the Court have questions about this request, please let us know.

Very truly yours,

**COHN LIFLAND PEARLMAN  
HERRMANN & KNOFF LLP**

/s/Jeffrey W. Herrmann  
Jeffrey W. Herrmann  
Attorney(s) for Plaintiff(s)

**STADLEY, RONON, STEVENS & YOUNG, LLP**

/s/Joe. N. Nguyen  
Joe N. Nguyen  
Attorney(s) for Defendant(s)

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<sup>1</sup> The parties meet and conferred on February 9, February 17 and February 24, 2022. The parties designated the conferences as privileged and confidential under Fed. R. Evid. 408.